

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW HAMPSHIRE**

**UNITED STATES OF AMERICA**

**v.**

**RYAN J. VALLEE**

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**1:15-Cr.No.- 115-01-PB**

**INDICTMENT**

The Grand Jury charges:

**Background**

1. At all times relevant to this indictment, defendant RYAN J. VALLEE, using aliases that included “Seth,” “Seth Williams,” “Seth William Banks,” “James,” and “James McRow,” resided in the District of New Hampshire.
2. Yahoo! Inc. (“Yahoo!”) provided electronic mail (“e-mail”) and other electronic communications services to users all over the world.
3. Google, Inc. (“Google”) provided electronic mail (“e-mail”) and other electronic communications services to users all over the world.
4. AOL, Inc. (“AOL”) provided electronic mail (“e-mail”) and other electronic communications services to users all over the world.
5. Facebook, Inc. (“Facebook”) provided social networking and other electronic communications services to users all over the world.
6. Instagram, Inc. (“Instagram”) provided photograph sharing and other electronic communications services to users all over the world.
7. Amazon, Inc. (“Amazon”) provided online merchant services to users all over the world.

8. Pinger, Inc. (“Pinger”), which is based in California, provided free “spoofing”/anonymizer text messaging services, which it called “textfree,” to users all over the world. The service allows users to send text messages that appear to come from a different, “spoofed” number that is not the user’s actual cell phone number.
9. At all times relevant to this indictment, a person whose identity is known to the Grand Jury and known to the defendant but is identified herein as “Jane Doe 1,” was a minor female who resided in the District of New Hampshire. At all times relevant to this indictment, VALLEE knew that Jane Doe 1 was a minor female.
10. At all times relevant to this indictment, a person whose identity is known to the Grand Jury and known to the defendant but is identified herein as “Jane Doe 2,” was a minor female who resided in the District of New Hampshire. At all times relevant to this indictment, VALLEE knew that Jane Doe 2 was a minor female.
11. At all times relevant to this indictment, a person whose identity is known to the Grand Jury and known to the defendant but is identified herein as “Jane Doe 3,” was a minor female who resided in the District of New Hampshire. At all times relevant to this indictment, VALLEE knew that Jane Doe 3 was a minor female.
12. At all times relevant to this indictment, a person whose identity is known to the Grand Jury and known to the defendant but is identified herein as “Jane Doe 4,” was a minor female who resided in the District of New Hampshire. At all times relevant to this indictment, VALLEE knew that Jane Doe 4 was a minor female.
13. At all times relevant to this indictment, a person whose identity is known to the Grand Jury and known to the defendant but is identified herein as “Jane Doe 5,” was a minor

female who resided in the District of New Hampshire. At all times relevant to this indictment, VALLEE knew that Jane Doe 5 was a minor female.

14. At all times relevant to this indictment, a person whose identity is known to the Grand Jury and known to the defendant but is identified herein as “Jane Doe 6,” was a minor female who resided in the District of New Hampshire. At all times relevant to this indictment, VALLEE knew that Jane Doe 6 was a minor female.

15. At all times relevant to this indictment, a person whose identity is known to the Grand Jury and known to the defendant but is identified herein as “Jane Doe 7,” was a minor female who resided in the District of New Hampshire. At all times relevant to this indictment, VALLEE knew that Jane Doe 7 was a minor female.

16. At all times relevant to this indictment, a person whose identity is known to the Grand Jury and known to the defendant but is identified herein as “Jane Doe 8,” was a minor female who resided in the District of New Hampshire. At all times relevant to this indictment, VALLEE knew that Jane Doe 8 was a minor female.

17. At all times relevant to this indictment, a person whose identity is known to the Grand Jury and known to the defendant but is identified herein as “Jane Doe 9,” was a minor female who resided in the District of New Hampshire. At all times relevant to this indictment, VALLEE knew that Jane Doe 9 was a minor female.

18. At all times relevant to this indictment, a person whose identity is known to the Grand Jury and known to the defendant but is identified herein as “Jane Doe 10,” was a minor female who resided in the District of New Hampshire. At all times relevant to this indictment, VALLEE knew that Jane Doe 10 was a minor female.

19. From in or about 2011 through in or about November 2013, VALLEE engaged in a computer hacking and “sextortion” campaign designed to force numerous minor females, including Jane Doe 1 through Jane Doe 10, to provide him with sexually explicit photographs of themselves. VALLEE employed a variety of techniques to force the victims he targeted to cede to his “sextortionate” demands. For example, VALLEE repeatedly accessed, without authorization (“hacked” into), and took control over, the victims’ online accounts. Once inside those hacked accounts, VALLEE locked the victims out of their own accounts, he sometimes defaced the contents of the accounts, and he sometimes used their stored payment account data to make unauthorized purchases of a sexual nature from the accounts. In some instances, VALLEE also obtained sexually explicit photographs of the victims and their friends and distributed them to others. With this backdrop, VALLEE repeatedly sent threatening electronic communications to the victims, telling them that, unless they gave him sexually explicit photographs of themselves, he would continue with the above-described conduct. When most of the victims refused to comply with VALLEE’s demands and begged him to leave them alone, VALLEE responded with threats to inflict additional harm.

#### **Hacking Into Online Accounts**

20. From in or about 2011 through in or about November 2013, VALLEE repeatedly accessed, without authorization (“hacked”), numerous minor females’ online accounts, including their accounts with Facebook, Instagram, Yahoo!, Google, AOL, and Amazon.com. He typically did this by guessing the answers to the security questions on these accounts, which is a way for users to reset a forgotten password, and then changing the account passwords.

21. Once VALLEE had hacked into the victims' accounts, he took control over their accounts, changed the passwords to their accounts, and prevented the victims from accessing their own accounts. In several instances, VALLEE defaced their social networking account pages by, for example, publishing embarrassing photographs and text on their Facebook pages.

**Stealing Payment Card Information and Making Unauthorized Sex-Related Purchases**

22. In one or more instances, from in or about 2012 through in or about November 2013, VALLEE hacked into one or more victims' accounts with the online merchant Amazon.com, which stored the victims' payment card information and shipping address.

23. VALLEE then used the victims' payment card information stored on their Amazon.com accounts to make unauthorized purchases of sex-related products, which he then had shipped to the victims' home addresses.

**Sending Threatening Online Communications and Sexually Explicit Images**

24. Beginning in or about 2010, VALLEE created accounts with one or more text message "spoofing"/anonymizer services, including "textfree," which is operated by California-based Pinger, Inc. VALLEE then used Pinger's "textfree" service and similar services to send text messages from "spoofed" phone numbers generated by those services, so that the recipients would not know VALLEE's true phone number or identity.

25. From approximately 2012-November 2013, using the "textfree" text message "spoofing" services and other methods of online communication, VALLEE sent multiple communications to numerous victims, which travelled in interstate commerce.

26. In these communications, VALLEE threatened the victims in an attempt to force them to provide him with sexually explicit photographs of themselves.

27. For example, VALLEE notified the victims that he had hacked into their various online accounts. He then demanded that they provide him with sexually explicit photographs of themselves in order to regain access to and control of their hacked accounts. In some cases, he threatened to continue hacking, to delete, and to deface their hacked accounts unless the victims provided him with sexually explicit photographs of themselves. If the hacked account was with the online merchant Amazon.com, VALLEE often threatened to make unauthorized purchases from the accounts unless the victims provided him with sexually explicit photographs of themselves.
28. In multiple instances, VALLEE notified the victims that he had obtained sexually explicit photographs of them and of their friends. He then threatened to distribute these sexually explicit photographs widely across the internet unless the victims provided him with sexually explicit photographs of themselves. As proof that he could carry out his threats, VALLEE sent the victims sexually explicit photographs of themselves and their friends, who were also minor females.

**Jane Doe 1**

29. In or about August 2012, VALLEE hacked into the Facebook account and Google e-mail account belonging to Jane Doe 1, took control of the accounts, and locked Jane Doe 1 out of her accounts.
30. In or about August 2012, VALLEE sent multiple texts to Jane Doe 1 telling her that he had obtained a sexually explicit photograph of her. As proof, VALLEE sent Jane Doe 1 a sexually explicit photograph of Jane Doe 1. VALLEE threatened Jane Doe 1 that he would distribute the photograph of Jane Doe 1 widely on the internet unless she sent him additional sexually explicit photographs of herself.

31. In or about August 2012, VALLEE defaced Jane Doe 1's Facebook account, changing her "profile" photograph to a photograph of Jane Doe 1 wearing a bikini. VALLEE sent Jane Doe 1 multiple texts demanding that she send him sexually explicit photographs of herself in exchange for returning her account access to her.
32. For example, in a series of texts that VALLEE sent to Jane Doe 1, VALLEE stated "I hacked your Facebook if you don't show me your tits, I will set this as your profile picture." "If you don't want me to set that as your Facebook profile take your bra off." "You have 15 minutes." "Pussy too girl." "You don't have a choice. If I don't see your tits by ten everyone will see your pussy. Don't make me do this." "I hacked you once, I can hack you again."
33. In or about August 2012, VALLEE, having taken over Jane Doe 1's Facebook account, used Jane Doe 1's Facebook identification to communicate online with others. Posing as Jane Doe 1, VALLEE sent Facebook messages to several of Jane Doe 1's Facebook "friends." VALLEE attempted to elicit personally identifiable information from her friends so that he could hack into her friends' online accounts by guessing the answers to security questions and changing their account passwords.

**Jane Doe 2**

34. In or about July 2012, VALLEE hacked into the Instagram account and e-mail accounts belonging to Jane Doe 2, took control of the accounts, and locked Jane Doe 2 out of her accounts.
35. In or about July 2012, VALLEE sent Jane Doe 2 multiple texts threatening to delete her accounts unless she sent him sexually explicit photographs of herself. He stated that he would give her access to her online accounts only if she complied with his demands.

36. For example, in a series of texts VALLEE sent to Jane Doe 2, VALLEE stated “Do you want instagram” “Show boobies. You have until midnight.” “I will delete your instagram. I changed your password just now. Trade titty picture for your instagram. Instagram will be deleted tomorrow at midnight if there is no naked picture of you.” He warned, “Good luck replacing all of the pictures. I won’t leave you alone unless you send it.” “Tits. Naked.” He stated “I want a picture ... Send the picture.”

**Jane Doe 3**

37. In or about July 2012, VALLEE hacked into the Facebook account and Google e-mail account belonging to Jane Doe 3, took control of the accounts, and locked Jane Doe 3 out of her accounts.

38. In or about July 2012, VALLEE sent Jane Doe 3 multiple texts threatening to delete her accounts unless she sent him compromising photographs of herself, further warning Jane Doe 3 that each day she delayed, he would demand that she remove an additional layer of clothing. He stated that he would give her access to her online accounts only if she complied with his demands.

39. For example, in a series of texts VALLEE sent to Jane Doe 3, VALLEE stated, “I hacked your facebook and emails do this or they will be deleted.” He demanded that she “put jeans on and take a picture of how your butt fills them out or Facebook will be deleted don’t tell anyone” “I am waiting” “Do this or I delete facebook.” When Jane Doe 3 refused, VALLEE warned her, “Each day you procrastinate sending this one layer of clothes will need to be removed.” When she begged him to “leave me alone,” he responded, “I won’t stop until you do this okay I have all of your email adresses [sic] hacked as well.” In another thread, he warned, “three minutes” “ONE MINUTE” “time



is up.” “You have been hacked again. Hacked gmail again hehehe.” “You need your email for college.” VALLEE then stated, “Do you enjoy anal” “I want to lick your pussy.”

**Jane Doe 4**

40. In or about April 2012, VALLEE hacked into the Facebook account and Yahoo! e-mail account belonging to Jane Doe 4, took control of the accounts, and locked Jane Doe 4 out of her accounts.
41. In or about July 2011 and again in or about April 2012, VALLEE sent Jane Doe 4 multiple texts demanding that she send him sexually explicit photographs of herself.
42. In or about April 2012, VALLEE sent Jane Doe 4 multiple texts telling her that he had a photograph of her of a sexual nature. He threatened to distribute it widely on the internet unless she sent him additional sexually explicit photographs of herself. As proof, VALLEE sent Jane Doe 4 a photograph that showed Jane Doe 4's naked buttocks.
43. In or about April 2012, VALLEE sent Jane Doe 4 a series of texts in which he notified Jane Doe 4 that he had hacked into her Facebook and Yahoo! e-mail accounts and would give her access to her online accounts only if she complied with his demands.
44. For example, in a series of texts VALLEE sent to Jane Doe 4, VALLEE stated “I need a naked pic of you.” “I’m just going to show your ass shots to [a classmate of Jane Doe 4].” “Send me a picture. Your friends did. [Listing first and last names of several classmates] and more.” “If you don’t send me a nude by 8, Im (sic) sending this picture to people and uploading them to Facebook.” When she refused, VALLEE stated, “I’m uploading your ass pix to your facebook.” When she begged him to “get off my FB [Facebook page],” he responded, “Send me a naked picture.” “As soon as I get a nude of

you.” “Take your clothes off.” “Get fucking naked on camera. . . .” “I’m going to have fun fucking you this summer.” In another series of texts, VALLEE stated, “Send me the photo you promised and I’ll return Facebook and Yahoo.”

45. When Jane Doe 4 sent VALLEE a text warning that she would contact the police, VALLEE responded, “Ha ha, calling the cops won’t stop your friends from seeing.” He also said, “They can’t find me . . . Trust me, I made sure I am untraceable.”

**Jane Doe 5**

46. In or about April 2012 VALLEE hacked into the Facebook account belonging to Jane Doe 5, took control of the account, and locked Jane Doe 5 out of her account.
47. In or about January 2012 and again in April 2012, VALLEE sent Jane Doe 5 multiple texts demanding that she send him sexually explicit photographs of herself in exchange for account access. In April 2012 VALLEE sent texts in which he further threatened to post compromising photographs of Jane Doe 5 on her Facebook page as her profile photograph. As proof, VALLEE sent Jane Doe 5 a sexually explicit photograph of a friend of Jane Doe 5, who is also a minor female.
48. For example, in a series of texts VALLEE sent to Jane Doe 5, VALLEE stated “If I don’t have a naked picture of you by 12:10 everyone will see this [which was a sexually explicit photograph of Jane Doe 5’s friend, a minor female].” VALLEE also threatened to publish a “sexy g string picture” of Jane Doe 5 on her Facebook page.

**Jane Doe 6**

49. In or about December 2012, VALLEE hacked into the Amazon.com account, Facebook account, and AOL email account belonging to Jane Doe 6, took control of the accounts, and locked Jane Doe 6 out of her accounts.
50. In or about December 2012, after hacking into Jane Doe 6's Amazon.com account, VALLEE used without authorization Jane Doe 6's payment card information that was electronically stored in her Amazon.com account, and he purchased and shipped to Jane Doe 6's home merchandise of a sexual nature. This included a "waterproof rabbit vibrator."
51. In or about December 2012, VALLEE sent Jane Doe 6 a series of texts in which he notified Jane Doe 6 that he had hacked into her Amazon, Facebook, and AOL accounts, and he would give her access to her online accounts only if she sent him sexually explicit photographs of herself.
52. For example, in or about December 2012, VALLEE sent Jane Doe 6 multiple texts stating, "Can I see your boobs. I will never bother you again if you show me. Deal? Show me your tits. Bitch show me those suckers." "Do you want me to leave you alone?" "Show tits if you want facebook back." "Do you want your facebook back I locked you out, of facebook this time. Show boobs. Do you want facebook back? Show boobs. Do you want facebook back?" "Show me and I will stop."
53. A few days later, VALLEE texted Jane Doe 6 again, stating "Do you want me to stop hacking you? I ordered a vibrator on amazon Show boobs and I will never bother you again. One Naked picture. Your password for aol and amazon is [inserted her passwords]."

54. Several months later, in or about March 2013, VALLEE again texted Jane Doe 6, asking, “do you like your vibrator? Give me an answer.” He repeated that several times and stated, “if you show me your boobs i will stop bothering you. i only wish to see your big tits.”

**Jane Doe 7**

55. In or about April 2012, VALLEE sent multiple texts to Jane Doe 7, notifying her that he had obtained sexually explicit photographs of her and threatening to send them to others unless she sent him additional sexually explicit photographs of herself. He also demanded that she perform specified sex acts for him.

56. For example, in a series of texts VALLEE sent to Jane Doe 7, VALLEE stated, “answer me or I will spread your nudes” “Show me your boobs one last time.” “Keep ignoring me and I will spread your nudes,” “Don’t make me spread these.” “Do this and I will leave you alone forever.” “Okay [Jane Doe 7] look I am calling you so finger yourself on the phone or I sen . . . [sic]” “Make sure your phone is on speaker beside your head” “I will stop after you do this” “Only if you finger yourself on the phone.” “Will you finger yourself” “Answer me”

**Jane Doe 8**

57. In or about October 2013, VALLEE sent multiple texts to Jane Doe 8, notifying her that he had obtained sexually explicit photographs of her friends. As proof, he sent Jane Doe 8 a link to a website that displayed a sexually explicit photograph of one of her friends, another minor female. He demanded that Jane Doe 8 send him sexually explicit photographs of herself in order for him to leave her alone in the future.

58. For example, in a series of texts VALLEE sent to Jane Doe 8 in October 2013, VALLEE stated “don’t ruin their lives. I will never bother you again I swear please show me . . . I know you pulled your boobs out a prom. I want to see them. If you show me I will never bother you again.” “Take off your bra and send nude pics. Want to see nude pics of [listing the name of Jane Doe 8’s friend, also a minor female].”

**Jane Doe 9**

59. In or about January 2013, VALLEE hacked into the Amazon.com account and Facebook account belonging to Jane Doe 9, took control of her Facebook account, and locked Jane Doe 9 out of her Facebook account.

60. In or about January 2013, after hacking into Jane Doe 9’s Amazon.com account, VALLEE used without authorization Jane Doe 9’s payment card information that was electronically stored in her Amazon.com account, and he purchased and shipped to Jane Doe 9’s home merchandise of a sexual nature. This included a “remote rick vibrating dildo” and “California exotics waterproof delights blue jelly.” VALLEE also purchased from Jane Doe 9’s Amazon.com account several adult entertainment videos, available to download or watch on demand.

61. In or about January 2013, VALLEE sent Jane Doe 9 a series of texts in which he notified Jane Doe 9 that he had hacked into her Facebook account, and he would give her access to her online account only if she sent him sexually explicit photographs of herself. He also stated that knew her payment card number and would buy a sex toy on her account unless she sent him sexually explicit photographs of herself. As proof, he sent the last four digits of her payment card number.

62. For example, in a series of texts VALLEE sent to Jane Doe 9 in January 2013, VALLEE stated “I want a nude photo,” “I will trade you your facebook for nude photo. I will leave your facebook alone if you send me a nude photo. [Victim’s first name], send me the photo and you can have facebook back.” He further texted “Send nude photo get facebook back. Don’t send nude photo debit card is charged. Ends in 8123. Amazon. Send the photo. \$200 will be charged if photo is not sent by 10:30. You have one minute. I am charging your debit card now. Send a naked photo and I won’t . . . hope you enjoy vibrators you’re getting alot [sic]” He continued, “Send me a nude photo I will cancel the orders I made and return facebook” “Get Naked.”

63. In or about January 2013, VALLEE, having hacked into and taken control over Jane Doe 9’s Facebook account, posted a link onto Jane Doe 9’s Facebook page that was from Amazon.com and indicated that she had purchased a vibrator. VALLEE, posing as Jane Doe 9, also sent Facebook messages to Jane Doe 9’s Facebook “friends” that stated that Jane Doe 9 purchased a vibrator.

**Jane Doe 10**

64. In or about August 2012, VALLEE sent multiple texts to Jane Doe 10 notifying her that he had her social security card and that if she did not send a sexually explicit photographs of herself, he would distribute Jane Doe 10’s social security number widely. VALLEE directed Jane Doe 10 to send the photograph to “taunyas\_lover@yahoo.com.”

**COUNTS ONE THROUGH TEN**  
**18 USC § 875(d)**  
**(Interstate Threats as to Jane Doe 1 through Jane Doe 10)**

65. The Grand Jury re-alleges and incorporates by reference paragraphs 1-64 of this

Indictment and further charges that:

On or about the dates set forth below, in the District of New Hampshire and elsewhere,  
defendant

RYAN J. VALLEE,

with intent to extort from any person, namely Jane Doe 1-Jane Doe 10 as set forth below,  
a thing of value, namely, sexually explicit images of Jane Doe 1-Jane Doe 10, transmitted  
in interstate commerce a communication containing a threat to injure the property,  
namely, to delete, deface, or make purchases from their online accounts, and to injure the  
reputation of the addressee and of another, namely, to widely distribute sexually explicit  
photographs of the addressee and of another.

All in violation of Title 18, United States Code, Section 875(d).

<b>Count Number</b>	<b>Victim Name</b>	<b>Type and Approximate Dates of Electronic Communications Sent</b>
1	Jane Doe 1	Texts on August 2, 2012
2	Jane Doe 2	Texts on July 17-27, 2012
3	Jane Doe 3	Texts on July 24-25, 2012
4	Jane Doe 4	Texts on April 16, 2012
5	Jane Doe 5	Texts in January 2012 Texts on April 23, 2012
6	Jane Doe 6	Texts on December 7-22, 2012 Texts on January 9, 2012 Texts on March 18, 2013

7	Jane Doe 7	Texts in December 2011-January 2012 Texts on April 29, 2012
8	Jane Doe 8	Texts on October 15-18, 2013
9	Jane Doe 9	Texts on January 22, 2013
10	Jane Doe 10	Texts on August 22, 2012 Email on August 22, 2012



**COUNTS ELEVEN AND TWELVE**  
**18 USC §§ 1030 (a)(2)(A), (c)(2)(B)**  
**(Computer Fraud and Abuse as to Jane Doe 6 and Jane Doe 9)**

66. The Grand Jury re-alleges and incorporates by reference paragraphs 1-64 of this

Indictment and further charges that:

On or about the dates set forth below, in the District of New Hampshire and elsewhere,  
defendant

RYAN J. VALLEE,

intentionally accessed a computer, namely the service provider's computer associated with the online accounts described below, without authorization and exceeded authorized access, and thereby obtained information of a card issuer as defined in section 1602(n) of this title, and information from any protected computer, namely a server of the service provider described below, and the offense was committed in furtherance of any criminal and tortious act in violation of the laws of the United States and any State, namely wire fraud in violation of 18 U.S.C. § 1343 and interstate threats in violation of 18 U.S.C. § 875.

All in violation of Title 18, United States Code, Section 1030(a)(2)(A), (c)(2)(B).

<b>Count Number</b>	<b>Account Holder Victim Name</b>	<b>Approximate Date</b>	<b>Account Accessed Without Authorization</b>
11	Jane Doe 6	December 2012	Amazon account
12	Jane Doe 9	January 2013	Amazon account

**COUNTS THIRTEEN THROUGH NINETEEN**  
**18 USC § 1030(a)(7)**  
**(Computer Fraud and Abuse as to Jane Doe 1 through Jane Doe 6 and Jane Doe 9)**

67. The Grand Jury re-alleges and incorporates by reference paragraphs 1-64 of this

Indictment and further charges that:

On or about the dates set forth below, in the District of New Hampshire and elsewhere,  
defendant

RYAN J. VALLEE,

with intent to extort from any person a thing of value, transmitted in interstate commerce  
a communication containing a threat to cause damage to a protected computer; a threat to  
obtain information from a protected computer without authorization and in excess of  
authorization and to impair the confidentiality of information obtained from a protected  
computer without authorization and by exceeding authorized access; and a demand and  
request for a thing of value in relation to damage to a protected computer, where such  
damage was caused to facilitate the extortion.

All in violation of Title 18, United States Code, Section 1030(a)(7).

<b>Count Number</b>	<b>Account Holder Victim Name</b>	<b>Approximate Date of Transmission of Threat</b>	<b>Service Provider Account Threatened</b>
13	Jane Doe 1	August 2012	Google account Facebook account
14	Jane Doe 2	July 2012	Instagram account Email account
15	Jane Doe 3	July 2012	Facebook account Google account
16	Jane Doe 4	April 2012	Facebook account Yahoo! account
17	Jane Doe 5	April 2012	Facebook account
18	Jane Doe 6	December 2012	Amazon account AOL account

19	Jane Doe 9	January 2013	Amazon account Facebook account
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**COUNTS TWENTY THROUGH TWENTY SIX**  
**18 USC § 1028A**  
**(Aggravated Identity Theft as to Jane Doe 1 through Jane Doe 6 and Jane Doe 9)**

68. The Grand Jury re-alleges and incorporates by reference paragraphs 1-64 of this

Indictment and further charges that:

On or about the dates set forth below, in the District of New Hampshire and elsewhere,  
 defendant

RYAN J. VALLEE,

during and in relation to a felony violation enumerated in 18 U.S.C. § 1030 as charged  
 above in Counts 13 through 19, knowingly transferred, possessed, and used, without  
 lawful authority, a means of identification of another person, namely, the account log-in  
 credentials of all of the individuals described below and the payment card information of  
 the individuals described as Jane Doe 6 and Jane Doe 9 below,

All in violation of Title 18, United States Code, Section 1028A(1).

<b>Count Number</b>	<b>Account Holder Victim Name</b>	<b>Approximate Date of Possession and Use of Victim's Means of Identification</b>	<b>Related to Unauthorized Access to Service Provider Account</b>	<b>Related Count</b>
20	Jane Doe 1	August 2012	Google account Facebook account	13
21	Jane Doe 2	July 2012	Instagram account Email accounts	14
22	Jane Doe 3	July 2012	Facebook account Google account	15
23	Jane Doe 4	April 2012	Facebook account Yahoo! account	16
24	Jane Doe 5	April 2012	Facebook account	17

25	Jane Doe 6	December 2012	Amazon account AOL account	18
26	Jane Doe 9	January 2013	Amazon account Facebook account	19

Dated: July 15, 2015

TRUE BILL

/s/ Foreperson  
Grand Jury Foreperson

Donald Feith  
Acting United States Attorney

By: /s/ Arnold H. Huftalen  
Arnold H. Huftalen  
Assistant U.S. Attorney

/s/ Mona Sedky  
Mona Sedky  
Senior Trial Attorney  
Sumon Dantiki  
Trial Attorney  
U.S. Department of Justice